

## REMARKS

Claims 1-38 are pending in the application and stand rejected. By the above amendment, claims 1, 2, 4-6, 17, 23, 26, 27, 34 and 36 have been amended. Applicant respectfully requests reconsideration of the claim rejections in view of the above amendments and the following remarks

### Claim Rejections- 35 U.S.C. § 103(a)

Claims 1-38 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,501,832 to Saylor et al. in view of U.S. Patent No. 6,438,217 to Huna and further in view of U.S. Patent No. 6,430,624 to Jamtgaard et al. In addition, claim 1 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Jamtgaard.

It is respectfully submitted that at the very minimum, the combination of Saylor, Huna and Jamtgaard is legally deficient to establish a *prima facie* case of obviousness against independent claims 1, 23 and 34 because such combination does not disclose or suggest, for example, *a conversational portal that comprises a conversational browser which provides a conversational user interface to enable access to the conversational portal across a plurality of different modalities*, much less *a conversational browser that adapts an interaction dialog between the conversational portal and the access device based on the at least one modality of the access device*, as essentially claimed in claims 1 and 23.

Further, with respect to claim 34, such combination does not disclose or suggest, for example, *a method for providing access to information over a communications network, which includes a conversational portal adapting an interaction dialog with an access device based on a modality of the access device*, as essentially claimed in claim 34.

Indeed, although Saylor arguably discloses a “portal”, Saylor discloses a Voice Portal system, which includes a voice browser that is capable of interaction only in one modality, i.e., audio modality. Saylor teaches that the disclosed Voice Portal system (i) is accessible by a user via voice or DTMF via “telephony devices”, (ii) only performs mono-modal dialog via a “voice browser” and (iii) only provides “voice content” by serving or processing only pre-constructed Vpages (voice modality). As such, it is clear that Saylor does *not* disclose or suggest a *conversational portal having a conversational browser which provides a conversational user interface to enable access to the conversational portal across a plurality of different modalities*, as essentially claimed in claims 1 and 23. Furthermore, with respect to claim 34, for example, there is no teaching or suggestion in Saylor of *a conversational portal adapting an interaction dialog with an access device based on a modality of the access device*, as essentially claimed in claim 34. Again, the portal disclosed in Saylor is limited to an audio modality, and the portal does not include a mechanism for adapting interaction dialog in other modalities.

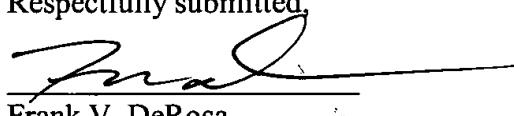
Furthermore, neither Huna nor Jamtgaard cures the deficiencies of Saylor in this regard. Huna is merely directed to a messaging system that is capable of converting messages (e-mail, voice, fax) to formats that are compatible with recipient devices. Again, for reasons that are readily apparent to one of ordinary skill in the art, the Huna process of converting simple text messages is very different from and not related to the claimed inventions.

Furthermore, Jamtgaard discloses a content delivery system wherein a user directly and independently accesses a web site (not via a portal) and wherein the web site accesses a translation server (12) only if the requesting device is not compatible with the format of the content pages supported by the accessed web site (see, e.g., Col. 7, lines 12-30). The translation

server (12) acts as a proxy server for an Internet content provider to translate content pages if needed, but the translation server (12) clearly does not function as a portal site. In fact, there is nothing in Jamtgaard that remotely discloses or suggests *a conversational portal that comprises a conversational browser which provides a conversational user interface to enable access to the conversational portal across a plurality of different modalities*, much less *a conversational browser/portal that adapts an interaction dialog between the conversational portal and the access device based on the at least one modality of the access device*, as essentially claimed in claims 1, 23 and/or 34.

Therefore, for at least the above reasons, claims 1, 23 and 34 are patentable and non-obvious over Saylor, Huna and Jamtgaard, either singularly or in any combination. Furthermore, all pending claims that depend from claims 1, 23 and 34 are believed to be patentable over the cited combination at least by virtue of their dependence from respective base claims 1, 23 and 34. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,



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